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Of Attorneys for Defendant Zuru, Ltd. (New Zealand)

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

ZING TOYS, INC., an Oregon corporation,
Plaintiff,

vs.

ZURU, LLC, an Oregon limited liability company, ZURU LIMITED (Hong Kong), ZURU LIMITED (New Zealand), ZURU, INC., ANNA JANE MOWBRAY, an individual; MATTHEW PETER MOWBRAY, an individual; and NICHOLAS JAMES MOWBRAY, an individual; and JOHN DOES 1 – 10,

Defendants.

Case No. CV10-863-HA

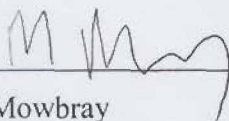
DECLARATION OF MATTHEW MOWBRAY IN SUPPORT OF ZURU, LTD'S (NEW ZEALAND) MOTION TO DISMISS PURSUANT TO Fed. R. Civ. P. 12(b)(2).

I, MATTHEW MOWBRAY, under penalty of perjury, do declare and state as follows:

- 1.) I have personal knowledge of all facts alleged herein.
- 2.) I am a New Zealand national who resides and works between Hong Kong and Guangzhou, PRC.

- 3.) I am the sole shareholder of Zuru, Ltd. (New Zealand).
- 4.) Zuru, Ltd. (New Zealand) is a company duly organized under the laws of New Zealand. It was formed in 2001, with the principle purpose of transacting business solely in New Zealand. All primary functions of Zuru, Ltd. (New Zealand) have been transferred to Zuru Inc.
- 5.) Zuru, Ltd. (New Zealand) has been inactive for years. It has no office in New Zealand, and utilizes my parents residence address as a mailing address. It does not engage in any manufacturing or marketing activities any where in the world, specifically not in the United States.
- 6.) Zuru, Ltd. (New Zealand) has never held assets or employees in the United States.
- 7.) Zuru, Ltd. (New Zealand) has never earned any business income from any activity or contact with the United States.
- 8.) Zuru, Ltd. (New Zealand) has never been a party to any joint venture agreement, distribution agreement or any other sort of business agreement with Zing Toys, Inc. or any other Zing Toy business entity in the United States or elsewhere.
- 9.) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of December 2010.


Matthew Mowbray